Draft Amended Environmental Assessment

Cooney State Park Cottonwood Lakeshore Repairs

09.15.2020

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Environmental Assessment
MEPA, MCA 23-1-110 CHECKLIST

PART I. PROPOSED ACTION DESCRIPTION

1. Type of proposed state action:

Montana State Parks (MSP), a division of Montana Fish, Wildlife and Parks (FWP), proposes one action at Cooney State Park (CSP); to stabilize and repair the lakeshore erosion of the waterfront campsites in the Cottonwood Campground caused by wave and wind action due to high reservoir levels during spring runoff.

2. Agency authority for the proposed action:

MSP has the authority to develop outdoor recreational resources in the state per 23-2-101 Montana Code Annotated (MCA): "*for the purposes of conserving the scenic, historic, archaeologic, scientific, and recreational resources of the state and providing their use and enjoyment, thereby contributing to the cultural, recreational and economic life of the people and their health."*
Statute 23-1-110 MCA and Administrative Rules of Montana (ARM) 12.2.433 guide public involvement and comment for the improvements at state parks, which this document provides. ARM 12.8.602 required the Department to consider the wishes of the public, the capacity of the site for the development, environmental impacts, long-range maintenance, protection of natural features and impacts on tourism as these elements relate to development or improvement to state parks. This document describes the proposed project in relation to this rule.

4. Anticipated Schedule:

Estimated Commencement Date: Fall 2020
Estimated Completion Date: Fall 2020
Current Status of Conceptual Project Design (% complete): 100%, to be finalized after public comment.

5. Location affected by proposed action (county, range and township – included map):

Cooney State Park is located approximately 8 miles north of the town of Roberts in Carbon County, Montana. The Park is located on the Cooney Dam Reservoir.

Fig 1. Location Map of Cooney State Park
Fig 2. Cooney State Park Map - Proposed Lakeshore Repairs

Figure 1: Location Map of Cooney State Park

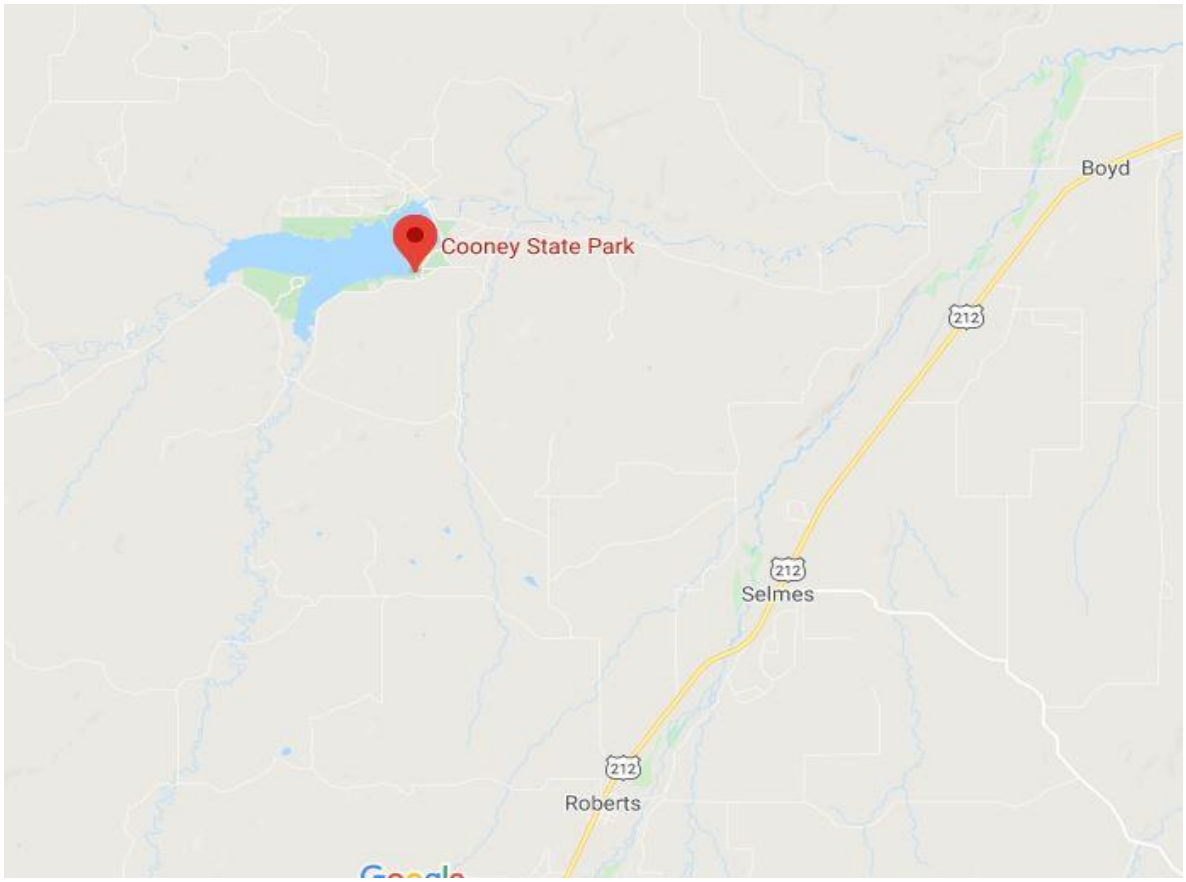
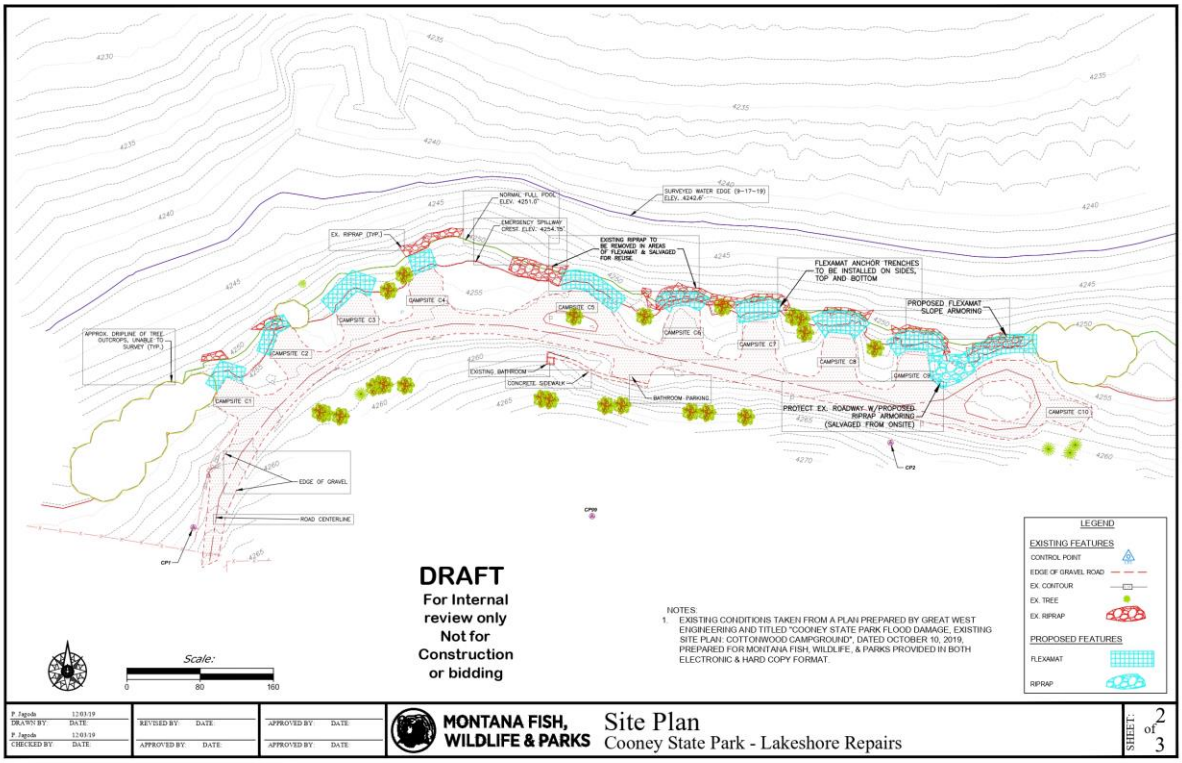
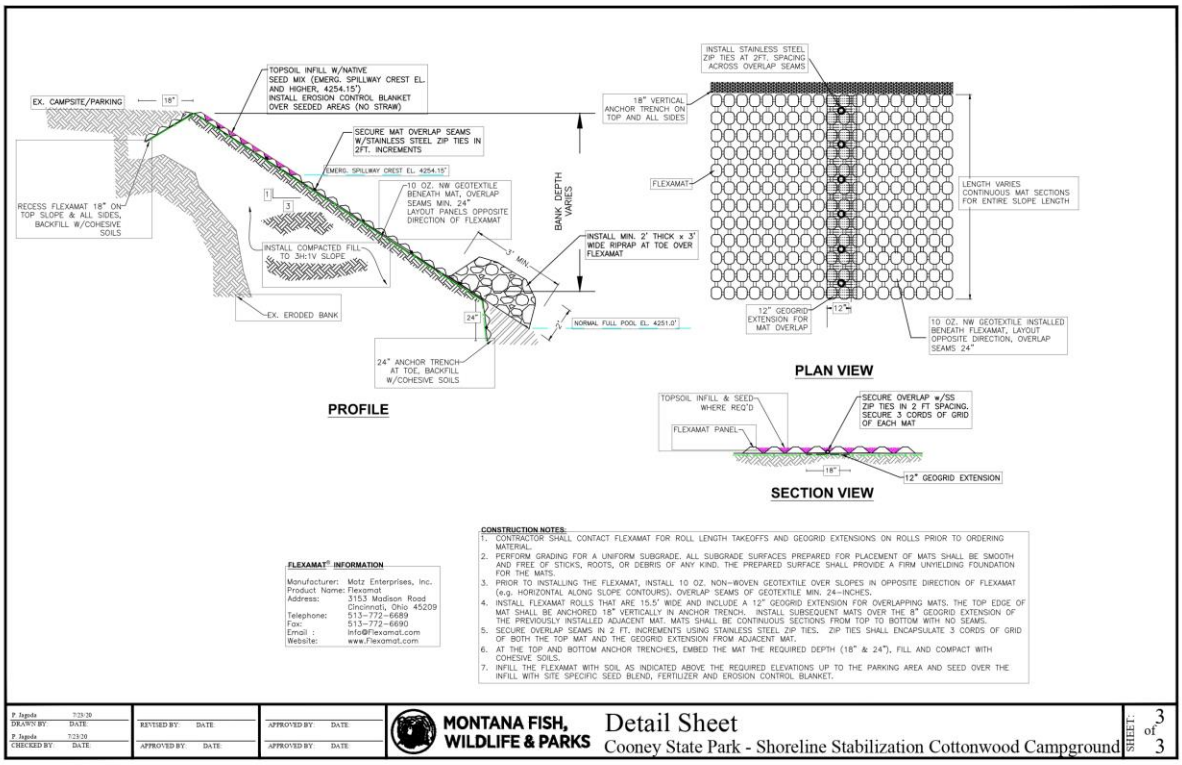


Figure 2: Cooney State Park Map - Proposed Lakeshore Repairs and Details





6. Project size -- estimate the number of acres that would be directly affected that are currently:

	Acres		Acres
(a) Developed:		(d) Floodplain	approx. 0.4
Residential	0		
Industrial	0	(e) Productive:	
(existing shop area)		Irrigated cropland	0
(b) Open Space/	0	Dry cropland	0
Woodlands/Recreation		Forestry	0
(c) Wetlands/Riparian	0	Rangeland	0
Areas		Other	0

7. Permits, Funding & Overlapping Jurisdiction.

(a) Permits: permits will be filed during the design process.

Agency Name	Permits
US Army Corps of Engineers	404 Permit
Dep. Natural Resources and Conservation	SPA 124
Carbon County Floodplain Administrator	Floodplain Permit
Dept. of Environmental Quality	401 Water Quality Certification-Waived, see attached letter dated 05/08/2020.

(b) Funding:

Capital Parks Projects = $135,000

(c) Other Overlapping or Additional Jurisdictional Responsibilities:

Agency Name	Type of Responsibility
Department of Natural Resources and Conservation	Landowner

8. Narrative summary of the proposed action:

Situated along the eastern shore of Cooney Reservoir, Cooney State Park (CSP) provides a full range of facilities including three boat ramps, a fish cleaning station, 89 campsites, vault latrines, full-service comfort station, and picnic shelters for the 172,000[1] annual visitors utilizing the park. In 2019 campsites were occupied for a total of 18,193[2] camper nights with an average stay of 2.03 nights.

Necessity of Lakeshore Repairs in the Cottonwood Campground:

Cooney State Park's Cottonwood campground has ten campsites, all of them situated along the waterfront. Shoreline erosion caused by high winds and

1 Montana State Parks "2018 Annual Visitation Report" (2018): p3

2 Montana State Parks "2019 Reservation Program Report" (2019): p5

wave impact has been an on-going challenge in the Cottonwood campground as Montana State Parks has rebuilt, filled and reinforced these vulnerable campsites in the past with riprap and vegetative plantings. Cooney State Park was temporarily closed for one week in 2019 when the reservoir filled and the spillway was activated, thus increasing the reservoir elevation. Wave and wind action are the primary cause of lakeshore erosion. The 2019 high-water event increased and created undercut banks on three campsites in the campground, C07, C08, and C09, which have now been closed to the public. Steep banks with undercutting are also threatening the integrity of the road between campsite C09 and C10. The remaining campsites are still open, yet suffer from continual soil erosion as storms, winds and wave action batter the eastern shoreline of the reservoir.

The proposed lakeshore repairs are as follows; The riprap will be replaced with Flexamat® tied concrete block mat, and the existing riprap that remains will be salvaged and used to armor the toe of the Flexamat® and part of the roadway between campsite C09 and C10. The installation of Flexamat® will re-establish the banks of campsites C01 to C09 and will provide safe access for the public.

Flexamat® is a tied concrete block mat used to control erosion in swales, slopes, ditches, channels, shorelines and any area where soil sediment may be lost due to water runoff. The matting consists of pyramidal concrete blocks that are interconnected utilizing a high tensile strength polypropylene geogrid. The completed mat yields a high strength, ultra-flexible hard armor system of erosion control.

The high performing mat is easy to maintain, is safe to mow over, conforms to the landscape, is safe for people and animals to walk across, improves water quality and is considered a low impact development, which is why it is preferred over traditional alternatives such as riprap and retaining walls. The Flexamat® will be infilled with topsoil and seeded with native seed mix, an erosion control blanket will be installed over the seeded areas. The mat area will be mowed as per park aesthetics.

The lakeshore repairs will enable the park to re-open the currently closed campsites, prevent further soil erosion and undercutting within the campground and create a safer interface for the public to access the water.

9. Description and analysis of reasonable alternatives:

<u>Alternative A:</u> No Action

If no action is taken, the campground will continue to erode leading to eventual closure and removal of current infrastructure, effectively decreasing opportunities for camping. Currently, three campsites have been closed to camping, C07, C08 and C09. Following the current trend of soil erosion, the road between C09 and C10 will become compromised in the next few years and will have to be closed to the public. This road currently leads to a turn-around, enabling large recreational vehicles to turn their vehicles around and exit the campground. Closing this road will limit recreational vehicle access to the Cottonwood campground entirely and reduce the visitor experience at the park. In

addition, campsites C01, C02 and C03 are rapidly eroding. As the site pads continue to shrink, they will become too small to accommodate recreational vehicles. Given the continued increase in visitation and demand for camping opportunities, park staff will continue the trend of spending operations monies and FTE man hours managing a disappearing campground. Funding allocated for this project would likely be reallocated to project needs at parks in other locations.

Alternative B: Proposed Action (Preferred)

The preferred course of action is twofold:

1. Salvage existing failed riprap and reuse as riprap armoring for the roadway to prevent total loss of road.
2. Rebuild the eroded campsites using compacted fill and installing **F**lexamat® (tied concrete block mat) along the exposed shorelines of each individual campsite in the Cottonwood campground.

   The project construction is scheduled for the fall, when reservoir levels are at their lowest. Low water levels will enable the construction crew and equipment to work on the shoreline without contacting the water, thus reducing opportunities for aquatic invasive species to be introduced into the reservoir.

Alternatives Considered but Not Pursued:

A. Riprap was originally considered as the primary option for shoreline stabilization, as that is the method that has been used in the past at Cooney State Park. The existing riprap was previously installed along the Cottonwood shoreline and the Marshall Cove shoreline. The lakeshore in these locations has continued to erode while wave action has physically moved the riprap and exposed large swaths of black fabric. After analyzing the failure rate and high cost of replacement in kind, this alternative was not pursued.
B. Permanent campsite removal and re-designation as Day-Use was considered a potential alternative. The shoreline would be allowed to further erode, and the campsite pads would be repurposed into parking spots. However, the Cooney State Park Final Management Plan from 2006, specifies as a Priority 1 Objective the improvement of camping opportunities at the park[3]. Consequently, permanent campsite removal does not align with the park's management plan and was not pursued.

10. Evaluation and listing of mitigation, stipulation, or other control measures enforceable by the agency or another government agency:

None**.**

PART II. ENVIRONMENTAL REVIEW CHECKLIST

[3] Montana State Parks, "Cooney State Park Draft Management Plan" (2006): p35

Evaluation of the impacts of the <u>Proposed Action</u> including secondary and cumulative impacts on the Physical and Human Environment.

A. PHYSICAL ENVIRONMENT

1. <u>LAND RESOURCES</u> **Will the proposed action result in:**	IMPACT					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Soil instability or changes in geologic substructure?		x				
b. Disruption, displacement, erosion, compaction, moisture loss, or over-covering of soil, which would reduce productivity or fertility?			x positive			1b
c. Destruction, covering or modification of any unique geologic or physical features?		x				
d. Changes in siltation, deposition or erosion patterns that may modify the channel of a river or stream or the bed or shore of a lake?		x				
e. Exposure of people or property to earthquakes, landslides, ground failure, or other natural hazard?		x				

1b. The proposed project is expected to reduce erosion of the lakeshore in the project area.

2. <u>AIR</u> **Will the proposed action result in:**	IMPACT					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Emission of air pollutants or deterioration of ambient air quality? (Also see 13 (c).)		x				
b. Creation of objectionable odors?		x				
c. Alteration of air movement, moisture, or temperature patterns or any change in climate, either locally or regionally?		x				
d. Adverse effects on vegetation, including crops, due to increased emissions of pollutants?		x				
e. <u>For P-R/D-J projects</u>, will the project result in any discharge, which will conflict with federal or state air quality regulations? (Also see 2a.)		x				

	IMPACT

3. WATER **Will the proposed action result in:**	**Unknown**	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Discharge into surface water or any alteration of surface water quality including but not limited to temperature, dissolved oxygen or turbidity?		x				
b. Changes in drainage patterns or the rate and amount of surface runoff?			x positive			3.b.
c. Alteration of the course or magnitude of floodwater or other flows?		x				
d. Changes in the amount of surface water in any water body or creation of a new water body?		x				
e. Exposure of people or property to water related hazards such as flooding?			x			3.e
f. Changes in the quality of groundwater?		x				
g. Changes in the quantity of groundwater?		x				
h. Increase in risk of contamination of surface or groundwater?		x				
i. Effects on any existing water right or reservation?		x				
j. Effects on other water users as a result of any alteration in surface or groundwater quality?		x				
k. Effects on other users as a result of any alteration in surface or groundwater quantity?		x				
l. For P-R/D-J, will the project affect a designated floodplain? (Also see 3c.)		x				
m. For P-R/D-J, will the project result in any discharge that will affect federal or state water quality regulations? (Also see 3a.)		x				

3.b. Surface runoff amount will be decreased, which is an improvement of current conditions.
3.e. Exposure to high water elevation during spring runoff is a reoccurring condition of the current site location.

	IMPACT

4. VEGETATION **Will the proposed action result in?**	**Unknown**	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Changes in the diversity, productivity or abundance of plant species (including trees, shrubs, grass, crops, and aquatic plants)?			x			4.a.
b. Alteration of a plant community?		x				
c. Adverse effects on any unique, rare, threatened, or endangered species?		x				
d. Reduction in acreage or productivity of any agricultural land?		x				
e. Establishment or spread of noxious weeds?			x			4.e
f. For P-R/D-J, will the project affect wetlands, or prime and unique farmland?		x				
g. Other:						

4.a. Native plant species will be planted, and abundance will increase, which is an improvement of current conditions.
4.e. Construction contract will include washing of construction equipment to mitigate spread of noxious weeds and aquatic invasive species.

5. FISH/WILDLIFE **Will the proposed action result in:**	**IMPACT**					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Deterioration of critical fish or wildlife habitat?		x				
b. Changes in the diversity or abundance of game animals or bird species?		x				
c. Changes in the diversity or abundance of nongame species?		x				
d. Introduction of new species into an area?		x				
e. Creation of a barrier to the migration or movement of animals?		x				
f. Adverse effects on any unique, rare, threatened, or endangered species?		x				

g. Increase in conditions that stress wildlife populations or limit abundance (including harassment, legal or illegal harvest or other human activity)?		x				
h. For P-R/D-J, will the project be performed in any area in which T&E species are present, and will the project affect any T&E species or their habitat? (Also see 5f.)		x				
i. For P-R/D-J, will the project introduce or export any species not presently or historically occurring in the receiving location? (Also see 5d.)		x				

B. HUMAN ENVIRONMENT

6. NOISE/ELECTRICAL EFFECTS **Will the proposed action result in:**	**IMPACT**					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Increases in existing noise levels?		x				
b. Exposure of people to serve or nuisance noise levels?		x				
c. Creation of electrostatic or electromagnetic effects that could be detrimental to human health or property?		x				
d. Interference with radio or television reception and operation?		x				

7. LAND USE **Will the proposed action result in:**	**IMPACT**					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Alteration of or interference with the productivity or profitability of the existing land use of an area?		x				
b. Conflicted with a designated natural area or area of unusual scientific or educational importance?		x				
c. Conflict with any existing land use whose presence would constrain or potentially prohibit the proposed action?		x				

d. Adverse effects on or relocation of residences?		x				

8. RISK/HEALTH HAZARDS **Will the proposed action result in:**	**IMPACT**					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Risk of an explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation) in the event of an accident or other forms of disruption?		x				.
b. Affect an existing emergency response or emergency evacuation plan, or create a need for a new plan?		x				
c. Creation of any human health hazard or potential hazard?		x				
d. For P-R/D-J, will any chemical toxicants be used? (Also see 8a)		x				

9. COMMUNITY IMPACT **Will the proposed action result in:**	**IMPACT**					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Alteration of the location, distribution, density, or growth rate of the human population of an area?		x				
b. Alteration of the social structure of a community?		x				
c. Alteration of the level or distribution of employment or community or personal income?		x				
d. Changes in industrial or commercial activity?		x				
e. Increased traffic hazards or effects on existing transportation facilities or patterns of movement of people and goods?		x				

10. PUBLIC SERVICES/TAXES/UTILITIES **Will the proposed action result in:**	**IMPACT**					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**

a. Will the proposed action have an effect upon or result in a need for new or altered governmental services in any of the following areas: fire or police protection, schools, parks/recreational facilities, roads or other public maintenance, water supply, sewer or septic systems, solid waste disposal, health, or other governmental services? If any, specify:		x				
b. Will the proposed action have an effect upon the local or state tax base and revenues?		x				
c. Will the proposed action result in a need for new facilities or substantial alterations of any of the following utilities: electric power, natural gas, other fuel supply or distribution systems, or communications?		x				
d. Will the proposed action result in increased use of any energy source?		x				
e. Define projected revenue sources		x				
f. Define projected maintenance costs.	x					

11. AESTHETICS/RECREATION **Will the proposed action result in:**	**IMPACT**					
	Unknown	**None**	**Minor**	**Potentially Significant**	**Can Impact Be Mitigated**	**Comment Index**
a. Alteration of any scenic vista or creation of an aesthetically offensive site or effect that is open to public view?		x				
b. Alteration of the aesthetic character of a community or neighborhood?		x				
c. Alteration of the quality or quantity of recreational/tourism opportunities and settings?			x positive			11c.
d. For P-R/D-J, will any designated or proposed wild or scenic rivers, trails or wilderness areas be impacted? (Also see 11a, 11c.)		x				

11c. The proposed project will improve camping opportunities for visitors and provide easy and safe public access to water.

12. CULTURAL/HISTORICAL RESOURCES Will the proposed action result in:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Destruction or alteration of any site, structure or object of prehistoric historic, or paleontological importance?		x				
b. Physical change that would affect unique cultural values?		x				
c. Effects on existing religious or sacred uses of a site or area?		x				
d. For P-R/D-J, will the project affect historic or cultural resources? Attach SHPO letter of clearance. (Also see 12.a.)		x				12.d

12.d. See attached letter of concurrence from SHPO dated 08/11/2020.

SIGNIFICANCE CRITERIA

13. SUMMARY EVALUATION OF SIGNIFICANCE Will the proposed action, considered as a whole:	IMPACT					
	Unknown	None	Minor	Potentially Significant	Can Impact Be Mitigated	Comment Index
a. Have impacts that are individually limited, but cumulatively considerable? (A project or program may result in impacts on two or more separate resources that create a significant effect when considered together or in total.)		x				
b. Involve potential risks or adverse effects, which are uncertain but extremely hazardous if they were to occur?		x				
c. Potentially conflict with the substantive requirements of any local, state, or federal law, regulation, standard or formal plan?		x				
d. Establish a precedent or likelihood that future actions with significant environmental impacts will be proposed?		x				
e. Generate substantial debate or controversy about the nature of the impacts that would be created?		x				

f. For P-R/D-J, is the project expected to have organized opposition or generate substantial public controversy? (Also see 13e.)		x				
g. For P-R/D-J, list any federal or state permits required.						13.g.

13.g. Permits listed above in section 7.

PART III. NARRATIVE EVALUATION AND COMMENT

The proposed action is not expected to have negative cumulative effects on the physical and/or human environments.

Montana State Parks will fulfill its public safety duties by repairing the lakeshore of the Cottonwood campground. The repairs will reduce safety concerns related to cut banks, undercutting and potential campsite and roadway failures. These improvements will contribute positively to the overall user experience at Cooney State Park through the continued availability of camping opportunities on the waterfront.

This project also complies with the long-range goals of MSP by raising park standards and having code compliant infrastructure through the provision of quality and diverse recreational experiences, which meets the Parks' Program Outcomes of protection and enhancement of public resources.

PART IV. PUBLIC PARTICIPATION

1. Public involvement:

The public will be notified in the following manners to comment on this current EA, the proposed action and alternatives:

Two public notices in each of these papers: Billings Gazette, Helena IR and Carbon County News.

Statewide press releases will be issued in addition to public notices on the Montana State Parks web page: *http://stateparks.mt.gov*.

2. Duration of comment period:

The public comment period will extend for (20) twenty days. Written comments will be accepted until 5:00 p.m., September 6th, 2020 and can be mailed or emailed to the addresses below:

Cooney State Park Facility Improvements
Cooney State Park
86 Lakeshore Rd.
Roberts, MT 59070

Email: myoshioka@mt.gov

PART V. EA PREPARATION

1. Based on the significance criteria evaluated in this EA, is an EIS required? (YES/NO)? No

Based on an evaluation of impacts to the physical and human environment under MEPA, this environmental review revealed no significant negative impacts from the proposed action; therefore an EIS is not necessary and an environmental assessment is the appropriate level of analysis in determining the significance of impacts.

2. Person(s) responsible for preparing the EA:

Marina Yoshioka, Park Manager
Cooney State Park
86 Lakeshore Rd.
Roberts MT 59070
406-445-2326

3. List of agencies or offices consulted during preparation of the EA:

1. Department of Natural Resources and Conservation
2. US Army Corps of Engineers
3. Department of Fish, Wildlife & Parks, Design and Construction Office

APPENDIX A

23-1-110 MCA
PROJECT QUALIFICATION CHECKLIST

Date: 08/01/2020 **Person Reviewing:** Marina Yoshioka

Project Location: Cooney State Park

Description of Proposed Work:
The following checklist is intended to be a guide for determining whether a proposed development or improvement is of enough significance to fall under 23-1-110 rules.

[ ] A. New roadway or trail built over undisturbed land?
Comments*: No.*

[ ] B. New building construction (buildings <100 sf and vault latrines exempt)?
Comments*: No.*

[ ] C. Any excavation of 20 c.y. or greater?
Comments*: No.*

[ ] D. New parking lots built over undisturbed land or expansion of existing lot that increases parking capacity by 25% or more?
Comments*: No*

[ ] E. Any new shoreline alteration that exceeds a doublewide boat ramp or handicapped fishing station?
Comments*: No*

[**X**] F. Any new construction into lakes, reservoirs, or streams?
Comments*: Yes*

[ ] G. Any new construction in an area with National Registry quality cultural artifacts (as determined by State Historical Preservation Office)?
Comments*: No*

[ ] H. Any new above ground utility lines?
Comments*: No*

[ ] I. Any increase or decrease in campsites of 25% or more of an existing number of campsites?
Comments*: No*

[ ] J. Proposed project significantly changes the existing features or use pattern; including effects of a series of individual projects?
Comments*: No*